

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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| In re: GALLERIA 2425 OWNER, LLC, <div style="text-align: right;">Debtor.</div> |))))))) | Case No. 23-34815 Chapter 11 |
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WITNESS AND EXHIBIT LIST

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| Judge: | Hon. Jeffrey P. Norman |
| Hearing Date: | December 18, 2024 |
| Hearing Time: | 11:00 a.m. prevailing Central Time |
| Party's Name: | Christopher R. Murray, Chapter 11 Trustee |
| Attorney's Name: | R. J. Shannon |
| Attorney's Phone: | (713) 714-5770 |
| Nature of Proceeding: | Hearing on: <ul style="list-style-type: none"> Trustee's Objection to Claim No. 6 of Rodney L. Drinnon [ECF No. 785]; Trustee's Objection to Claim No. 9 of Nichamoff Law PC, Borunda, P.C., and the Norwood Firm, P.C. [ECF No. 787]; and Trustee's Objection to Claim No. 19 of Lloyd. E. Kelley [ECF No. 791]. |

Christopher R. Murray, the Trustee of the liquidation trust in the above-captioned case (the "Trustee"), hereby submits this witness and exhibit list in connection with the hearing to be held on December 18, 2024, at 11:00 a.m. (Central Time) (the "Hearing").

WITNESSES

The Trustee may call any of the following witnesses at the Hearing, whether in person, by proffer, or by declaration pursuant to Fed. R. Civ. P. Rule 43(c) made applicable by Bankruptcy Local Rule 9017-1(c):

1. Christopher R. Murray
2. Any witness called or designated by any other party; and
3. Any witness necessary to rebut the testimony of any witness called or designated by any other party.

EXHIBITS

The Trustee may offer for admission into evidence any of the following exhibits, any exhibit designated by any other party, and any document filed on the docket in the above-captioned case at the Hearing:

| Ex. | Description | Offered | Objection | Admitted /Not Admitted | Disposition |
|------------|-----------------------------------------------------------------------------------------------------------------|----------------|------------------|---------------------------------------|--------------------|
| 1 | Proof of Claim No. 6 filed by Rodney L. Drinnon | | | | |
| 2 | Trustee's Objection to Claim No. 6 of Rodney L. Drinnon [ECF No. 785] | | | | |
| 3 | Declaration of Christopher R. Murray in Support of Trustee's Objection to Claim No. 6 [ECF No. 785-2] | | | | |
| 4 | Drinnon's Response to Trustee's Objection to Claim No. 6 [ECF No. 822] | | | | |
| 5 | (Demonstrative) Annotated Version of Trustee's Objection to Claim No. 6 of Rodney L. Drinnon [ECF No. 785] | | | | |
| 6 | Proof of Claim No. 9 filed by Nichamoff Law PC, Borunda, P.C., and the Norwood Firm, P.C. | | | | |
| 7 | Trustee's Objection to Claim No. 9 of Nichamoff Law PC, Borunda, P.C., and the Norwood Firm, P.C. [ECF No. 787] | | | | |

| Ex. | Description | Offered | Objection | Admitted /Not Admitted | Disposition |
|------------|------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|------------------|---------------------------------------|--------------------|
| 8 | Declaration of Christopher R. Murray in Support of Trustee's Objection to Claim No. 9 [ECF No. 787-2] | | | | |
| 9 | Response to Objection to Proof of Claim No. 9 [ECF No. 821] | | | | |
| 10 | (Demonstrative) Annotated Version of Trustee's Objection to Claim No. 9 of Nichamoff Law PC, Borunda, P.C., and the Norwood Firm, P.C. [ECF No. 787] | | | | |
| 11 | Confidential Settlement Agreement [ECF No. 250-37] | | | | |
| 12 | Proof of Claim No. 14 filed by National Bank of Kuwait | | | | |
| 13 | Memorandum Opinion [ECF No. 565] | | | | |
| 14 | Order Confirming Chapter 11 Plan of Liquidation of the Debtor by National Bank of Kuwait, S.A.K.P. New York Branch [ECF No. 566] | | | | |
| 15 | Final Judgment re Appeal of Confirmation Order [ECF No. 835] | | | | |
| 16 | Proof of Claim No. 19 filed by Lloyd E. Kelley | | | | |
| 17 | Trustee's Objection to Claim No. 19 of Lloyd E. Kelley [ECF No. 791] | | | | |
| 18 | Declaration of Christopher R. Murray in Support of Trustee's Objection to Claim No. 19 [ECF No. 791-2] | | | | |
| 19 | Lloyd Kelley's Response to Objection to Claim and Motion to Compel Arbitration [ECF No. 834] | | | | |

| Ex. | Description | Offered | Objection | Admitted /Not Admitted | Disposition |
|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|------------------|-------------------------------|--------------------|
| 20 | Order Granting Trustee's Motion for an Order (A) Authorizing the Trustee to Sell the Estate's Claims Against Sonder USA Inc. and Sonder Canada, Inc., (B) Providing that any such Sale Will Be Free and Clear of Interests Except for Interests of Contingency Counsel and Defenses, and (C) Granting Related Relief [ECF No. 337] | | | | |
| 21 | Deed of trust granted by the Debtor to NBK dated May 23, 2018 (previously admitted as ECF No. 143-8, 501-11, and 692-10) | | | | |
| 22 | Absolute assignment of leases granted by the Debtor to NBK dated May 23, 2018 (previously admitted as ECF No. 143-9 and 692-11) | | | | |

The Trustee reserves the right to supplement, amend, or delete any witness and exhibits prior to the Hearing. The Trustee also reserves the right to (a) ask the Court to take judicial notice of any document, (b) introduce exhibits previously admitted or attached as exhibits to the relevant pleadings, and (c) introduce any exhibit necessary or appropriate to necessary to rebut the testimony of any witnesses called or designated by any other party or an exhibit introduced or designated by any other party.

Dated: December 16, 2024

Respectfully submitted,

SHANNON & LEE LLP

/s/ R. J. Shannon

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